

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

_____)	
GENERAL ELECTRIC COMPANY,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 08-591-TSE/JFA
)	
ADRIANA KOECK,)	
)	
Defendant.)	
_____)	

**MEMORANDUM IN SUPPORT OF
EMERGENCY JOINT MOTION TO STAY PROCEEDINGS**

In support of their emergency joint motion to stay proceedings, plaintiff General Electric Company ("GE") and defendant Adriana Koeck state as follows:

1. As of November 14, 2008, the parties have reached an agreement on all outstanding claims in this action.
2. This settlement is part of a settlement of a putative class action pending against GE in the United States District Court for the District of Connecticut captioned *Lorene F. Schaefer v. General Electric Company, et al.*, Case No. 3:07-CV-0858 (PCD) ("*Schaefer*"). Lead counsel for defendant Koeck are also plaintiffs' counsel in *Schaefer*.
3. The parties in *Schaefer* have signed a term sheet memorializing their agreement, and are working to complete a written agreement.
4. Final settlement and dismissal of the action pending in this Court must wait until the *Schaefer* settlement documents -- which will address and settle the claims in this action -- are executed.

5. Given the impending deadlines in this case over the next few weeks -- including a summary judgment hearing scheduled for November 21, 2008, expert reports, depositions, and a discovery cut-off of December 12, 2008 -- it is in the interest of both judicial economy and the conservation of the parties' respective resources that the Court stay proceedings in this matter for 14 days to allow the drafting and execution of the settlement papers.

WHEREFORE, the parties jointly request that the Court grant the emergency joint motion to stay proceedings.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of November, 2008, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send notification of such filing (NEF) to the following:

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